2861 34th Street South . St. Petersburg, FL 33711 Phone: 727-867-4444 • Fax: 727-866-1438

Theodore L. Drell, Ph.D. Vice President

February 14, 2005

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Overnight Mail

Office of Nutritional Products, Labeling and Dietary Supplements Center for Food Safety and Applied Nutrition Food and Drug Administration 200 C Street, S.W. Washington, DC 20204

Ref: Almased® Nutritional Supplement

Dear Sir and/or Madam:

This is notification and substantiation to the Food and Drug Administration (FDA) for Dietary Supplement Claims made persuant to Section 403(r) (6) of the Federal Food, Drug, and Cosmetic Act for claims made on the "Almased" product label, a dietary supplement, which went on sale January, 2005. The claims are as follows:

Claim I: "Reduce Weight, inches and Fat"

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Claim II: "Revitalize Energy"

Claim III: "Restore Wellness with Almased"

Claim IV: "Protects muscle mass while losing fat"

Claim V: "Additional benefits of probiotics and enzymes aid in digestive and immune system

function"

90999

Claim VI: "Diets low in satuated fat and cholesterol that include 25 grams of soy protein a day may reduce the risk of heart disease. One serving of Almased provides 25 grams of soy protein."

The information contained herein is a complete and accurate representation of the product named. Almased USA, Inc. has hereto provided substantiation of these statements of nutritional support based on the scientific literature which render those statements truthful and not misleading.

Sincerely,

Theodore L. Drell, Ph.D.